

**BEFORE THE INDEPENDENT HEARINGS PANEL APPOINTED
BY THE QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER OF of the Te Pūtahi Ladies Mile Plan Variation in
accordance with section 80B and 80C, and
Part 5 of Schedule 1 of the Resource
Management Act 1991

**STATEMENT OF LAY EVIDENCE OF PHILIP BLAKELY ON
BEHALF BLAKELY WALLACE FAMILY**

Date: 20 October 2023

INTRODUCTION

1. My name is Philip Blakely. This submission is on behalf of myself and my family. I have been a resident in the Whakatipu Basin for 38 years. I am a practicing landscape architect.
2. While I am not providing this evidence as an expert, by way of background, a key part of my work experience has been in assessing landscape values and integrating and/or assessing the impact of development proposals on landscapes. I was a committee member of the Wakatipu Environmental Society Inc. (**WESI**) for at least 15 years during the period where WESI contributed significantly to the Operative Queenstown Lake District Plan including key Environment Court decisions. I have been for many years and remain a member of the Arrowtown Planning Advisory Group (**APAG**) which assesses all consent applications and proposals for infrastructure in the Historic Zone and on occasions for the whole town and makes recommendations to the Council.

SCOPE OF EVIDENCE

3. My evidence expands on the submission by the Blakely Wallace Family to the TPLM Variation. The submission includes commentary on:
 - Overarching concerns regarding the appropriateness of the Variation in total in this location
 - The effects on landscape, rural character and the main entrance to Queenstown and the Basin
 - Traffic and infrastructure
 - The effects of High Density Residential (HDR) and especially of buildings up to 24m high and its effects on the ONF of Slope Hill
 - Comment on the Building Restricted Area (BDR) on the north side of SH6

- Lack of recognition of the agricultural and pastoral history of the Ladies Mile and the character derived from it including hedgerows tree planting and vegetation.

Overarching concern about the Variation

4. I consider the nature and type of the variation is inappropriate in this location. While I accept that there is a need for more housing in the District I do not see this as the solution. Landscape, rural character and the entrance to Queenstown are key matters of concern. The use of this land for productive purposes contributes significantly to its rural character and the landscape quality and there is a need to protect this for future generations.
5. The Heritage report included the history of Threepwood and Glenpanel and acknowledges that their establishment was directly related to cereal growing and agriculture on the Ladies Mile as a consequence of the productive soils. It is my understanding that the Ladies Mile soils are classified as productive soils.
Notwithstanding the legal reason for the NPS for productive soils deemed not to be relevant in the case of Ladies Mile (i.e. due to having been zoned for urban development by strategic planning studies) it is a crucially important issue which I would like the Hearings Panel to take into account. Once soil is lost it is lost forever. It is important to contemplate that if it wasn't for this legal anomaly the variation would have likely not succeeded with the enacting of the NPS.
6. In addition to the loss of high quality soils, the agricultural history of the Ladies Mile and the character derived from it which still exists today is also significant and important and is part of Queenstown's character and feel for residents and visitors. I consider that this has not been adequately addressed in the

Variation supporting documents. The Skelton Landscape and Visual Assessment did not address cultural (European) landscape values and character in any meaningful way although I note this has been covered to some extent in his subsequent evidence included in the Section 42A report.

The effects on landscape, rural character and the main entrance to Queenstown and the Basin

7. One of the special things about Queenstown and the Whakatipu Basin and what makes it stand apart from other similar tourist resorts in a global context is landscape and rural character within the wider Basin area. This would be seriously eroded in a key location if this variation succeeds.
8. While I accept Mr Skelton's assessment in terms of landscape and visual effects on the wider Landscape of the Whakatipu Basin to be low I do not accept his conclusions for the Ladies Mile Landscape Character Unit (LCU). He acknowledges that the proposal 'seeks to change a part of Landscape Character Unit from a predominantly rural character to an urban character 'but does not provide an effects rating for this, only for the wider landscape.

'While the TPLM Variation will change the open character of TPLM, particularly the lands north of SH6, the wider values and attributes of the landscape will largely be maintained. I consider that the existing zoning will result in similar effects to those potentially enabled by the TPLM Variation. Clearly, the increased potential building heights enabled by the TPLM Variation will result in more intensive development than is anticipated by Rural Lifestyle zoning. However, the character shift away from an open landscape is anticipated'¹.

¹ Evidence of Mr Skelton. Para.54

9. Using the scale of effects Mr Skelton uses I would rate the massive change to the character of Ladies Mile as at least high or possibly very high.

10. Nor do I agree with the statement regarding visual amenity in the Landscape and Visual Assessment report below:

‘Overall and on balance, it is considered the proposal will change the amenity experienced from SH6 in the vicinity of the site. However, the memorable and valued visual amenity will largely be retained and the proposed change will result in no more than low adverse effects on visual amenity’².

I do not see that the level of change proposed will result in no more than ‘low adverse effects on visual amenity’.

11. In his evidence Mr Skelton argues that the Ladies Mile has changed in recent years and that rural character has been eroded and that the Rural Lifestyle Precinct zoning will change it further. This maybe partly true but I consider there is a major difference from Precinct Lifestyle zoning compared to the variation proposal which includes HDR and buildings potentially up to 24m.

12. The Threepwood subdivision at the eastern end of Ladies Mile approved by the Environment Court several years ago has buildings set back against Slope Hill with generous open space next to SH6 and which has preserved rural character and openness. This demonstrates that with good design open rural character and spaciousness can be retained with Lifestyle zoning and residential housing.

13. Queenstown is the premier tourist destination in New Zealand. I consider the variation in its current form would degrade the

² Para.5.51 Skelton TPLM Landscape & Visual Assessment Report

character and values in a key location and completely change the character of the main entrance to Queenstown.

Traffic and infrastructure

14. The strategies and ‘mode shift’ proposed for traffic and transport are in my view unrealistic and do not reflect how people live and work in the Whakatipu Basin. For example trades people and tourism operators will make up part of the population who will live there. They will need their own private vehicles as well as many other people living there. Bus lanes and cycleways while good initiatives will not mitigate the inevitability of more traffic with a projected population of 10,000 living in the eastern corridor.

Effects of HDR especially of buildings up to 24m high and its effects on the ONF of Slope Hill.

15. HDR and especially of buildings potentially up to 24m high in my opinion is totally inappropriate, incongruous and out the context of rural Wakatipu Basin. It is transposing Auckland planning and design to Queenstown in a completely different context and setting.
16. In addition I consider buildings up to 24m in the foreground of Slope Hill would impact on the values of the ONF of Slope Hill. I consider that buildings of this height will inevitably effect and impact on the ONF to a moderate to moderately high effect on ONL values.
17. In this regard I disagree with Mr Skelton that Slope Hill is not appreciated from Ladies Mile.

5.27. Slope Hill’s outstanding values are most appreciated from outside the Ladies Mile LCU. While the steep, often shady south face of Slope Hill is visible from Ladies Mile, it’s most significant

*contribution to the Ladies Mile LCU and other lands to the south is its role in providing visual access to open space (Images 7, 8, 12, 13, 15). The smooth up face (west) and plucked down face (east) of the Slope Hill roche moutonnée feature aren't apparent from Ladies Mile. The Slope Hill ONF and its outstanding qualities are best appreciated from farther afield*³

18. In my opinion the ONF of Slope Hill applies to all aspects/sides of the 'Roche Moutonnee' and I can attest to more than 30 years of appreciating it on a regular basis from SH6.

19. With the exception of the effects of HDR and buildings potentially up to 24m I do however agree with the landscape and visual assessment that the effects on the ONF of Slope Hill will be low.

Changes requested should the Variation proceed

20. Notwithstanding the overriding submission for the Variation to be rejected I do support a comprehensive planning approach for the Ladies Mile. Should the variation proceed in some form I request the following changes:

1 A 12m building height limit

2. A 75m setback on the north side of SH6

21. The 25m BRA is insufficient. A much more generous building setback and buffer is required. In my opinion it should be a 75m setback to align with Queenstown Country Club (QCC) on the south side of SH6. This would retain some semblance of ruralness, spaciousness and open space. I note Mr Skelton supports the 75m setback being retained by the QCC to retain open space, spaciousness and views but not on the north side of SH6.

³ Para 5.27 S. Skelton. TPLM Landscape and Visual assessment report

22. I note also the Wakatipu Basin Landscape Use Study (WBLUS) by Bridget Gilbert recommended a 75m setback for the Ladies Mile if it was zoned for Urban development.

Hedgerows, tree planting and vegetation on the north side of SH6

23. The masterplan does not make any reference to the existing vegetation on the north side of SH6 or how or if it will be protected with upgrades and bus lanes and cycleways on SH6. Some of this vegetation is quite significant and important and dates back to settlement of the District and its agricultural/pastoral history (refer to images 8,9,10,11,12 in Mr Skeltons evidence. The hawthorn hedges are in my opinion heritage features. In the past they were protected in the District Plan as heritage items but they appear to have been removed in reviews of the Plan. I note that in Mr Skelton's evidence he addresses the roadside vegetation on the north side of SH6 and states that the intention is that this will be retained. I remain concerned and sceptical about the practicality of retaining this vegetation with proposed upgrading of the SH6 including bus lanes and bike trails as well as open space within the narrow 25m BRA.

CONCLUSION

24. On behalf of the Blakely Wallace family I ask the Hearings Panel to reject the Variation in its in its current form for the reasons outlined in this submission.

Dated: 20 October 2023

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Philip Blakely